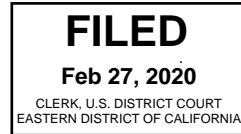


John A White BL2389 proper
Name and Prisoner/Booking Number
DVI
Place of Confinement
23500 KASSON Rd
Mailing Address
TRACY CA 95304
City, State, Zip Code



(Failure to notify the Court of your change of address may result in dismissal of this action.)

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

John Antonio White proper
(Full Name of Plaintiff) Plaintiff,

v.

(1) DRENNY AUTO ENTERPRISE, LLC
(Full Name of Defendant)

(2) CHARLES ASSAY

(3) JIMMY MARTINEZ

(4) DOES 1-20 ET AL.

Defendant(s).

☐ Check if there are additional Defendants and attach page 1-A listing them.

CASE NO. 2:20-cv-0453 JAM KJN (PS)

(To be supplied by the Clerk)

CIVIL RIGHTS COMPLAINT
BY A PRISONER

☒ Original Complaint

☐ First Amended Complaint

☐ Second Amended Complaint

A. JURISDICTION

1. This Court has jurisdiction over this action pursuant to:

☒ 28 U.S.C. § 1343(a); 42 U.S.C. § 1983

☐ 28 U.S.C. § 1331; Bivens v. Six Unknown Federal Narcotics Agents, 403 U.S. 388 (1971).

☒ Other: DIVERSITY / FOREIGN OWNED CORPORATION 28 USC.
1332

2. Institution/city where violation occurred: CAMERON PARK, CALIFORNIA.

B. DEFENDANTS

1. Name of first Defendant: O'REILLY AUTO ENTERPRISES, LLC. The first Defendant is employed as:
D/B/A O'REILLY AUTO PARTS at 3398 COACH LN. CAMERON PARK, CA. 95682
(Position and Title) (Institution)
2. Name of second Defendant: Jimmy MARTINEZ, D.M.. The second Defendant is employed as:
DISTRICT MANAGER, O'REILLY AUTO PARTS at 3398 COACH LN. CAMERON PARK, CA. 95682
(Position and Title) (Institution)
3. Name of third Defendant: CHARLES ASSAY. The third Defendant is employed as:
STORE MANAGER, O'REILLY AUTO PARTS at 3398 COACH LN CAMERON PARK, CA 95682
(Position and Title) (Institution)
4. Name of fourth Defendant: DOES 1-20 ET AL.. The fourth Defendant is employed as:
CORPORATE HDQTRS. - MISSOURI at CORPORATE HDQTRS.
(Position and Title) (Institution)

If you name more than four Defendants, answer the questions listed above for each additional Defendant on a separate page.

C. PREVIOUS LAWSUITS

1. Have you filed any other lawsuits while you were a prisoner? ☐ Yes ☒ No
2. If yes, how many lawsuits have you filed? _____. Describe the previous lawsuits:
 - a. First prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____
 - b. Second prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____
 - c. Third prior lawsuit:
 1. Parties: _____ v. _____
 2. Court and case number: _____
 3. Result: (Was the case dismissed? Was it appealed? Is it still pending?) _____

If you filed more than three lawsuits, answer the questions listed above for each additional lawsuit on a separate page.

UNLAWFUL

USE OF CRIMINAL HISTORY TO DENY ME EMPLOYMENT AS A "KEY HOLDER" PROMOTION, A NEW POSITION, VIOLATING CALIFORNIA LAWS.

IN DECEMBER 2017 I WAS EMPLOYED AS A PARTS SPECIALIST FOR O'REILLY AUTO PARTS IN SANTA CRUZ, CA. AFTER COMPLETING AN ONLINE APPLICATION. ONE QUESTION IN THE APPLICATION ASKED IF I HAD ANY 'FELONY CONVICTIONS' AND FOR SPECIFICS OF THE NATURE AND 'CONSEQUENCE/RESULT'. I ANSWERED TO THE BEST OF MY ABILITY AND MEMORY, MY LAST CONVICTION BEING 2007-2008, ALMOST 10 YEARS PRIOR.

I DISCOVERED A POSITION AVAILABLE IN PLACERVILLE / CAMERON PARK AND IN MAY 2018 I DROVE THE 200 MILES TO INTERVIEW FOR A NEW POSITION AT THE CAMERON PARK STORE, SPEAKING TO THE MANAGER CHARLES ASSAY.

I WAS TOLD OF HIS NEED FOR A "CLOSER KEY HOLDER", AN ASST. MANAGER POSITION. THIS WAS A STEP TO BEING A MANAGER OF A STORE, MY GOAL. I WAS HIRED AND MOVED TO CAMINO, CA.

I BEGAN WORK IN JUNE 2018 AND BEGAN TRAINING AS A KEY HOLDER IMMEDIATELY. IN JULY OR AUGUST I FORMALLY APPLIED FOR THE NEW PROMOTION, APPLYING ONLINE THRU THE O'REILLY TEAM MEMBER SYSTEM.

I WAS DENIED THE POSITION "KEY HOLDER" BASED SOLELY UPON A NON-WORK RELATED PROBATION VIOLATION THAT WAS A RESULT OF A CONVICTION OF A CRIME I HAD DISCLOSED IN BOTH MY NEW HIRE APPLICATION AND THE APPLICATION FOR THE NEW JOB AS PART OF A MANAGEMENT TEAM MEMBER FOR O'REILLY AUTO ENTERPRISES, I APPEALED THIS DECISION TO CORPORATE HEADQUARTERS AND MY APPEAL WAS DENIED, DESPITE BEING RECOMMENDED BY STORE MANAGER CHARLES ASSAY AND DISTRICT MANAGER JIMMY MARTINEZ. - 4 - INJURY OF PLAINTIFF.

I SUFFERED THE COST OF MOVING TO RELOCATE TO TAKE THE NEW POSITION / JOB, THE LOSS OF ANTICIPATED WAGES COST ME THE ABILITY TO MAINTAIN ANY RENT COSTS IN THE AREA, ~~MAKING~~ ^{CAUSING} ME TO BECOME HOMELESS. LOST WAGES, BENEFITS, COMMISSIONS AND BONUSES, THE ABILITY TO ADVANCE WITHIN THE CORPORATE STRUCTURE WAS DENIED TO ME,

CLAIM III

1. State the constitutional or other federal civil right that was violated: DISCLOSURE OF A MEDICAL / MENTAL HEALTH ISSUE TO UNAUTHORIZED PERSON
FEDERAL COMMON LAW - BREACH OF FIDUCIARY DUTY, 42 USC 4934

2. Claim III. Identify the issue involved. Check only one. State additional issues in separate claims.

- | | | | |
|--|---|--|---------------------------------------|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input checked="" type="checkbox"/> Other: <u>42 USC 12114 USC § 710 F32 492</u> | |

3. Supporting Facts. State as briefly as possible the FACTS supporting Claim III. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

WHILE ON MEDICAL LEAVE FROM O'REILLY AUTO PARTS IN CAMERON PARK CALIFORNIA I WENT TO ANOTHER O'REILLY AUTO PARTS STORE IN PLACERVILLE, CALIF. THIS IS A NEARBY AFFILIATE STORE IN THE SAME DISTRICT. I WAS RETURNING A FAULTY BATTERY UNDER WARRANTY. THE MANAGER WAS VERY SHORT WITH ME, STATING I WAS NOT TO COME IN HIS STORE IF I HAD BEEN DRINKING. A DIRECT INSINUATION OF WHY I WAS ON LEAVE. THIS WAS IN FRONT OF OTHER EMPLOYEES AND CUSTOMERS. HE THEN DIRECTLY ACCUSED ME OF BEING A THIEF, AND STATED HE WOULD NOT REPLACE THE BATTERY AND I WAS NOT TO COME IN HIS STORE AGAIN. I WENT TO SPEAK TO THE DISTRICT MANAGER AND AT CAMERON PARK, WHERE I WAS STILL EMPLOYED, AND WAS TOLD BY AN EMPLOYEE AT THE COUNTER, I WAS NOT ALLOWED IN THE STORE, THE EMPLOYEE WAS "ROBERT" A NEW RE-HIRE.

4. Injury. State how you were injured by the actions or inactions of the Defendant(s).

I WAS HUMILIATED. MY PRIVACY INVADED, I WAS BLANDERED, MY MEDICAL INFORMATION WAS DISCLOSED TO AN UNAUTHORIZED PARTY, I WAS SUBJECT TO RIDICULE PUBLICLY, WHILE OFF DUTY AND ON PERSONAL TIME.

5. Administrative Remedies.

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☐ Yes ☒ No
- Did you submit a request for administrative relief on Claim III? ☐ Yes ☒ No
- Did you appeal your request for relief on Claim III to the highest level? ☐ Yes ☒ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. N/A

If you assert more than three Claims, answer the questions listed above for each additional Claim on a separate page.

D. CAUSE OF ACTION

CLAIM IV - (4)

1. State the constitutional or other federal civil right that was violated: US C 42 1983-1981
~~REPOSE~~ DUE PROCESS, ASHA VIOLATION, EQUAL PROTECTION,

2. **Claim I.** Identify the issue involved. Check **only one**. State additional issues in separate claims.

- | | | | |
|--|---|--|---------------------------------------|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input checked="" type="checkbox"/> Other: <u>WRONGFUL TERMINATION</u> | |

3. **Supporting Facts.** State as briefly as possible the FACTS supporting Claim I. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

IN THE FALL OF 2018 (SEPT-OCT) AS AN EMPLOYEE FOR O'REILLYS, I WENT ON A UNPAID, UNSPECIFIED, WORK-RELATED STRESS (DUE TO AN ONGOING PERVASIVE AND DAILY HOSTILE WORK ENVIRONMENT) MEDICAL LEAVE, THAT I WAS DIRECTED TO GO ON BY THE DISTRICT MANAGER, JIMMY MARTINEZ FOR O'REILLYS AUTO PARTS IN CAMERON PARK, CA. I WAS ARBITRARILY TERMINATED WITHOUT CAUSE. WHEN MY DISTRICT MANAGER DIRECTED ME TO GO ON LEAVE I WAS DENIED WORKERS COMP BENEFITS, TEMPORARY SSD AND NO INJURY REPORT WAS FILED, THERE BY DENYING ME THE OPPORTUNITY TO FILE/RECEIVE A.D.A. ACCOMMODATIONS FOR ~~SEE~~ WORK RELATED STRESS, EVEN THOUGH A FEMALE (MUCH YOUNGER) EMPLOYEE WAS RECEIVING A DA ACCOMMODATION FOR STRESS AND MENTAL HEALTH REASONS, THE EXACT PROBLEM I WAS REPORTING AND SUBSEQUENTLY DENIED. ~~WHILE~~ I WAS TERMINATED WHILE ON MEDICAL LEAVE. IN JANUARY 2019, WITHOUT NOTICE, WITHOUT CAUSE.

4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s). I WAS DENIED BENEFITS I WAS ENTITLED TO UNDER THE MEDICAL PLAN I HAD PAID INTO, DENIED WORKMENS COMP, ADA ACCOMMODATIONS, EQUAL PROTECTION UNDER THE LAW, AND WAGES, COMMISSIONS AND OPPORTUNITY FOR REHABILITATION TRAINING UNDER OBHA.

5. **Administrative Remedies:**

- a. Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? N/A - ☐ Yes ☒ No
- b. Did you submit a request for administrative relief on Claim I? ☒ Yes ☒ No
- c. Did you appeal your request for relief on Claim I to the highest level? ☒ Yes ☒ No
- d. If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. N/A - NON-PRISONER ISSUE.

(6)

CLAIM ~~IV~~ (5)

1. State the constitutional or other federal civil right that was violated: DENIAL of WORKMAN COMP BENEFITS / ADA ACCOMMODATIONS / DOE PROCESS
42 USC 1983 (a) OSHA REPORTING PRACTICES WORKERS COMP PRACTICES

2. Claim II. Identify the issue involved. Check only one. State additional issues in separate claims.

- | | | | |
|--|---|--|--|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input checked="" type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: <u>USC 42 1981</u> | |

3. Supporting Facts. State as briefly as possible the FACTS supporting Claim II. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

BY PLACING ME ON UNPAID MEDICAL LEAVE FOR WORK RELATED STRESS DUE TO AN ONGOING HOSTILE WORK ENVIRONMENT DEFENDANTS DENIED ME ACCESS TO ADA ACCOMMODATIONS; AND NO WORK INJURY REPORT WAS FILED WITH OSHA DESPITE MY MANY COMPLAINTS TO MANAGEMENT.

RATHER THAN ADDRESS AND REMEDY THE OFFENDING EMPLOYEES, THEY DISMISSED ME WHILE ON MEDICAL LEAVE, FOR UNDISCLOSED REASON NOT STRESS RELATED WORK INJURY.

MY MENTAL HEALTH DETERIORATED TO THE POINT OF A NERVOUS BREAKDOWN THAT WENT UNDIAGNOSED AND WAS A DIRECT RESULT I BEGAN DRINKING AFTER 10 YEARS OF SOBRIETY, RESULTING IN MY BECOMING ARRESTED IN THE CURRENT SITUATION, A 4 YEAR PRISON TERM.

4. Injury. State how you were injured by the actions or inactions of the Defendant(s).

DENIED ADA ACCOMMODATIONS AND I HAD RESUMED DRINKING AFTER 10 YRS OF SOBRIETY. OSHA, WORKERS COMP DENIAL OF BENEFITS

5. Administrative Remedies. N/A

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☐ Yes ☒ No
- Did you submit a request for administrative relief on Claim II? ☐ Yes ☒ No
- Did you appeal your request for relief on Claim II to the highest level? ☐ Yes ☒ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. _____

E. REQUEST FOR RELIEF

State the relief you are seeking:

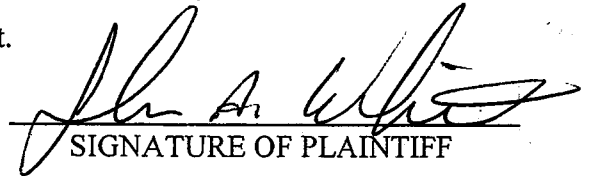
I AM ASKING \$2,000,000 - (2 million dollars) FOR PUNITIVE & EXEMPLARY DAMAGES, 100,000 - FOR WAGES, BENEFITS, REHABILITATIVE COSTS, COURT FEE'S AND ASSOCIATED COSTS, THERAPY / COUNSELING, RE-TRAINING COSTS, CONTINUED MEDICAL CARE UNDER THE PLAN PAID FOR BY O'REILLYS, LIFE TIME MEDICAL COVERAGE, A BURIAL PLOT PAID FOR BY O'REILLY, FOR DEBRA NEVE-ARNOLD THAT ADJOINS HER MOTHER'S FATHERS, WITH A HEADSTONE IN SANTA CRUZ, CALIFORNIA, AND ALL COSTS ASSOCIATED WITH GETTING DEBRA HOME, NEXT TO HER PARENTS OR REIMBURSE ALL COSTS IF DONE PRIOR TO THE END OF THIS LAWSUIT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

2/17/20

DATE


SIGNATURE OF PLAINTIFF

(Name and title of paralegal, legal assistant, or other person who helped prepare this complaint)

(Signature of attorney, if any)

(Attorney's address & telephone number)

ADDITIONAL PAGES

All questions must be answered concisely in the proper space on the form. If you need more space you may attach more pages, but you are strongly encouraged to limit your complaint to twenty-five pages. If you attach additional pages, be sure to identify which section of the complaint is being continued and number all pages. Remember, there is no need to attach exhibits to your complaint.

CLAIM II

1. State the constitutional or other federal civil right that was violated: ALLOWING A HOSTILE WORK ENVIRONMENT WHILE A PROTECTED CLASS (ADA)
42 U.S.C. 1981 (A), (B), (C)

2. Claim II. Identify the issue involved. Check **only one**. State additional issues in separate claims.

- | | | | |
|--|---|--|---------------------------------------|
| <input type="checkbox"/> Basic necessities | <input type="checkbox"/> Mail | <input type="checkbox"/> Access to the court | <input type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings | <input type="checkbox"/> Property | <input type="checkbox"/> Exercise of religion | <input type="checkbox"/> Retaliation |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input checked="" type="checkbox"/> Other: <u>HOSTILE WORK ENVIRONMENT</u> | |

3. Supporting Facts. State as briefly as possible the FACTS supporting Claim II. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.

AS A RESULT OF MY HOMELESSNESS DUE TO THE FINANCIAL LOSS OF ANTICIPATED WAGES AND COMMISSIONS, I BECAME DEPENDENT AND SUFFERED A RELAPSE. I HAD BEEN ALCOHOL/DRUG FREE FOR OVER 4 YEARS AND AS A RESULT I BEGAN SUFFERING HUMILIATING TAUNTS COMMENTS (SUCH AS "PEE-EW") FROM OTHER EMPLOYEES, NAMELY A YOUNG LADY NAMED STEPHANIE, THIS HOSTILE ATTITUDE TRANSLATED INTO OTHER EMPLOYEES UNWILLING TO WORK WITH ME, AVOIDING ME AS A THREAT. I WOULD SEE EMPLOYEE'S GATHERED IN BACK NEAR THE COMMERCIAL DESK REPS AREA, WATCH ME WORK OR PLAYING VIDEOS ON CELLPHONES, YOUTUBE VIDEOS ETC... AND DISPERSE AS I CAME NEAR. I SPOKE TO THE COMMERCIAL DESK REP, WHICH DID NO GOOD, I SPOKE TO CHARLES ASAY ON SEVERAL OCCASIONS, I TOLD HIM HOW IT WAS AFFECTING MY WORK MORALE AND FINALLY MY SOBRIETY. THIS WAS A MEDICAL AND MENTAL HEALTH ISSUE NOW AS I WAS SUFFERING DEPRESSION AND MENTAL ANGUISH OVER MY WORK ENVIRONMENT BEING SO HOSTILE TOWARDS ME. I WENT TO CHARLES TO RESIGN, HE TOOK ME TO TALK TO THE D.M. JIMMY MARTINEZ, HE INSTRUCTED ME TO GO ON.

4. Injury. State how you were injured by the actions or inactions of the Defendant(s).

I WAS HUMILIATED, OSTRACIZED, LIBELED/SLANDERED, RIDICULED, MY PRIVACY OF MEDICAL CONDITIONS WAS VIOLATED, I WAS DENIED DISCITAL BENEFITS I HAD PAID FOR, I WAS REFUSED ADA ACCOMODATIONS NO OSHA REPORT WAS FILED FOR TO MY KNOWLEDGE - CONT ON 4(C)

5. Administrative Remedies.

- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☐ Yes ☐ No
- Did you submit a request for administrative relief on Claim II? ☐ Yes ☐ No
- Did you appeal your request for relief on Claim II to the highest level? ☐ Yes ☐ No
- If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. _____

PAGE 4 (R)

CLAIM II SUPPORTING FACTS CONTINUED:

WHAT HE DESCRIBED AS AN "UNPAID MEDICAL LEAVE" FOR "UNSPECIFIED REASONS" TO SEEK PRIVATE help for my RELAPSE AND UPON MY RETURN FROM MEDICAL LEAVE I COULD THEN TRANSFER TO A STORE WITH AN OPENING WHO WOULD HAVE ME. HE WOULD APPROVE THIS TRANSFER, INDICATING TO ME HE COULD ASSURE ME A TRANSFER WHEN I WAS PREPARED TO COME BACK FROM MEDICAL LEAVE, WHICH HE CLAIMED WOULD BE "OPEN ENDED", NO LIMIT TO HOW MUCH TIME I NEEDED TO "REGROUP" AND REJOIN THE "TEAM".

RATHER THAN ADDRESS THE HOSTILE WORK ENVIRONMENT AND DISCIPLINE THE ~~MANAGING~~ EMPLOYEES WHO WERE THE OFFENDING PARTIES, I WAS MADE TO FEEL WORSE. I WAS BASICALLY BANISHED FROM O'REILLYS. I HAD NO WHERE TO TURN AND WAS HUMILIATED AND OSTRACIZED IN THE ENTIRE AREA. I WENT TO O'REILLY AUTO IN PLACERVILLE TO RETURN A DEAD BATTERY I'D PURCHASED AT ~~THE~~ OTHER STORE, AND WAS OUTRIGHT ACCUSED OF TRYING TO DEFRAUD THEM WITH 1) NOT AN O'REILLY BATTERY PRODUCT OR 2) HAD STOLEN THE BATTERY, DESPITE MY HAVING A RECEIPT. THE MANAGER'S NAME WAS 'JOHN' SOMETHING WHO I SPOKE WITH. I REPLIED "MY RECORD IS IMPECCABLE, I'M A TOP SALES PERSON IN MY STORE", HE REPLIED "MAYBE YOU SHOULD TALK

PAGE 4 (C)
CLAIM II SUPPORTING FACTS (CONT.)

TO YOUR CO-WORKERS* ABOUT THAT." INDICATING SOMEONE HAD SPOKEEN TO HIM. HE ALSO MADE 'A COMMENT "YOU SHOULDN'T COME INTO MY STORE DRUNK". I WAS NOT IN UNIFORM, NOR WAS I ON DUTY. THIS COMMENT INDICATED TO ME SOME ONE FROM CAMERON PARK HAD BEEN DIVULGING PRIVILEGED INFORMATION TO HIM, A DIRECT VIOLATION OF MY RIGHT TO PRIVACY REGARDING A MEDICAL CONDITION, FURTHERING THE HOSTILE ENVIRONMENT INTO MY DAILY LIFE NOT DIRECTLY ASSOCIATED WITH MY DUTIES AS AN OREILLY EMPLOYEE.

AS A RESULT OF THIS INCIDENT I WAS BANNED FROM ANY STORE IN THE AREA. I WENT TO THE OREILLY STORE IN CAMERON PARK TO SEE THE DISTRICT MANAGER AND WAS NOT ALLOWED IN THE STORE. THIS WAS THE ULTIMATE IN HOSTILE WORK ENVIRONMENTS, AND WAS SO UTTERLY HUMILIATING I HAD A NERVOUS BREAKDOWN. MY GIRLFRIEND, AND BEST FRIEND FOR 40 YEARS BECAME SO STRICKEN SHE SUFFERED HORRIBLY DEBILITATING MIGRAINES WHERE I HAD TO HAVE HER HOSPITALIZED SEVERAL TIMES. SHE SUFFERED DEPRESSION SO SEVERE, ON JUNE 8TH 2019 SHE COMMITTED SUICIDE IN REDDING CALIFORNIA.

I BECAME SO DEPRESSED I FELL INTO AN ABYSS OF ALCOHOL AND DRUGS.

FINALLY I WAS ARRESTED IN DECEMBER

CLAIM II SUPPORTING FACTS (CONT.)

2018 FOR HAVING A CONCEALED DIRK OR DAGGER WHILE WORKING TO FREE MY R.V.'S DRIVELINE FROM A TANGLE OF TOW STRAP/ROPE, USING THIS KNIFE I HAD. I WAS GIVEN A 4 YEAR PRISON TERM FOR HAVING THIS KNIFE, WHERE I AM NOW.

4). INJURIES SUFFERED - CLAIM 2 - CONTINUED

I WAS DENIED THE WORKMENS COMPENSATION I AM ENTITLED TO FOR A WORK RELATED INJURY I REPORTED TO BOTH CHARLES ASSAY AND JIMMY MARTINEZ. I WAS DENIED THE EXPECTATION OF A HOSTILE FREE WORK ENVIRONMENT.

I WAS DENIED DUE WAGES, COMMISSIONS AND BONUSES. I WAS DENIED DIGNITY. I WAS AND STILL AM DENIED THE BEST FRIEND I'VE EVER HAD, DEBRA NEVE-ARNOLD, AND I WILL NEVER AGAIN HEAR HER CALL ME "HEY YA MISTER" AGAIN. I MISS THE COMFORT AND COMPANIONSHIP OF HER'S.

I AM AN AMERICAN WITH A DISABILITY SUFFERING A LIFELONG BATTLE WITH ADDICTION AND WHILE SEEKING TREATMENT FOR IT I WAS CONFRONTED WITH HOSTILE, DISRESPECTFUL COMMENTS, HUMILIATED, EMBARRASSING CONFRONTATIONS BY UNAUTHORIZED PERSONS FOR A PRIVATE MEDICAL AND MENTAL HEALTH CONDITION AND ULTIMATELY FIRED FOR IT.